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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION
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20 IN RE JUNIPER NETWORKS, INC.
SECURITIES LITIGATION
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No. C06-04327-JW

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING LEAD
PLAINTIFF'S RESPONSES AND
OBJECTIONS TO ERNST & YOUNG
LLP'S FIRST SET OF
INTERROGATORIES**

BEFORE: Hon. Patricia V. Trumbull

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28 STIPULATION AND [PROPOSED] ORDER REGARDING LEAD PLAINTIFF'S RESPONSES AND OBJECTIONS TO
ERNST & YOUNG LLP'S FIRST SET OF INTERROGATORIES – CASE NO. 06-04327-JW

1 This Stipulation is entered into by and among Lead Plaintiff the New York City Pension
2 Funds and Defendant Ernst & Young LLP ("EY"), by and through their respective attorneys of
3 record.

4 WHEREAS, on November 30, 2009, Lead Plaintiff served its Responses and Objections
5 to EY's First Set of Interrogatories (the "First Set of Interrogatories");

6 WHEREAS, pursuant to the Stipulation and Order dated December 9, 2009, the parties
7 agreed that Lead Plaintiff would to supplement its responses to the First Set of Interrogatories no
8 later than January 15, 2010, and that EY would file any motion to compel further responses
9 would no later than January 29, 2010;

10 WHEREAS, the parties met and conferred on January 12, 2010, regarding Lead
11 Plaintiff's request to extend its time to serve supplemental responses to the First Set of
12 Interrogatories by one week from January 15, 2010 to January 22, 2010, and to correspondingly
13 extend EY's time to move to compel by one week;

14 THEREFORE, Lead Plaintiff and EY stipulate, and request that the Court order that Lead
15 Plaintiff shall serve supplemental responses to the First Set of Interrogatories by January 22,
16 2010, and that, if the parties have disputes regarding the sufficiency of Lead Plaintiff's responses
17 to the First Set of Interrogatories that cannot be mutually resolved, EY may file and serve a
18 motion to compel further responses to the First Set of Interrogatories no later than February 5,
19 2010, and such motion will not be deemed untimely.

1 Dated: January 12, 2010

LOWEY DANNENBERG COHEN & HART, P.C.

2 By: /s/

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8 *Attorneys for Lead Plaintiffs*

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Local Counsel

12 I, David C. Harrison, am the ECF user whose ID and password are being used to file this
13 Stipulation and [Proposed] Order Scheduling Case Management Conference. In compliance
14 with General Order 45, X.B., I hereby attest that David Friedman has concurred in this filing,
15 and I have her manual signature on file.

15 Dated: January 12, 2010

LATHAM & WATKINS LLP

16 By: /s/

17 David M. Friedman
18 505 Montgomery Street, Suite 2000
19 San Francisco, CA 94111-6538
20 Telephone: 415-391-0600
21 Facsimile: 415-395-8095
22 *Counsel for Defendant Ernst & Young LLP*

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22 **ORDER**

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24 PURSUANT TO STIPULATION, IT IS ORDERED.

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26 DATED: January 21, 2010

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28 United States Magistrate Judge